

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

James Andrew Grimmer
Secured Party Creditor,
Sui Juris, In Propria Persona,

Plaintiff,

v.

Citibank, N.A.,

Defendant.

Case No. 0:25-cv-02758-ECT-DLM

**MOTION TO EXTEND TIME TO
ANSWER OR OTHERWISE
RESPOND TO COMPLAINT**

Defendant Citibank, N.A. (“Citibank”) moves for a 14-day extension of the July 9, 2025 deadline for Citibank to answer or otherwise respond to Plaintiff’s Complaint. The Court may extend this deadline on the basis of good cause. Fed. R. Civ. P. 6(b)(1).

Here, due to the intervening July 4 holiday and the number of claims alleged by Plaintiff, Citibank believes there is good cause to extend the July 9, 2025 deadline up to and including July 23, 2025. The extended period will allow Citibank’s recently retained counsel sufficient time to complete its evaluation of Plaintiff’s numerous claims and formulate a response to the Complaint. Further, Citibank filed the Notice of Removal several days before the deadline to do so solely to comply with the Minnesota State Court rules response deadline. As a result, a 14-day extension would place the new response deadline only five days after the anticipated deadline had Citibank filed the Notice of Removal at the end of the 30-day window permitted by 28 U.S. Code § 1446.

For these reasons, Citibank respectfully requests a 14-day extension of the July 9,

2025 deadline for Citibank to answer or otherwise respond to Plaintiff's Complaint.

Dated: July 7, 2025

BALLARD SPAHR LLP

Respectfully submitted,

By: /s/ Karla M. Vehrs

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